

REMARKS

The Specification has been amended. Claims 5, 13, 26, and 30 - 32 have been amended. No new matter has been introduced with these amendments, all of which are supported in the specification as originally filed. Claims 3 - 5, 7 - 9, and 11 - 33 remain in the application.

Applicants are not conceding that the subject matter encompassed by the claims as presented prior to this Amendment is not patentable over the art cited by the Examiner, as claim amendments in the present application are directed toward facilitating expeditious prosecution of the application and allowance of the currently-presented claims at an early date. Applicants respectfully reserve the right to pursue claims, including the subject matter encompassed by the claims as presented prior to this Amendment and additional claims, in one or more continuing applications.

I. Rejection under 35 U. S. C. §103(a)

Paragraph 7 of the Office Action dated July 12, 2007 (hereinafter, “the Office Action”) states that Claims 2 - 5, 7 - 9, and 11 - 33 are rejected under 35 U. S. C. §103(a) as being unpatentable over U. S. Patent 6,591,260 to Schwarzhoff in view of U. S. Patent Publication 2004/00883221 [note, should be 2004/0083221] to Dapp et al. (hereinafter, “Dapp”). This rejection is respectfully traversed.

With reference to each of Applicants' independent Claims 13, 24, 26, 31, and 32, the Office Action cites col. 5, line 19 - col. 6, line 43 of Schwarzhoff as teaching elements thereof. Applicants respectfully disagree with this analysis of Schwarzhoff, as will now be discussed.

Referring first to independent Claim 13, this claim as currently presented recites:

A computer-implemented method of casting objects, comprising:
validating syntax elements of an input, using a validating parser,
according to a first syntax level while generating output objects, from the input
using the validating parser, according to a second syntax level, wherein the
generating further comprises suppressing, by the validating parser, at least one
of the validated syntax elements from the generated output objects in order that
the generated output objects will be valid according to the second syntax level;
and
providing the generated output objects for use by an application
program. (emphasis added)

Applicants respectfully submit that Schwarzhoff fails to teach (at least) the above-underlined recitations of independent Claim 13. Applicants acknowledge that the cited text from Schwarzhoff (col. 5, line 19 - col. 6, line 43; see the discussion of Claim 13 on p. 5, line 17 - p. 6, line 10 of the Office Action) discusses use of extended schemas; see col. 5, lines 25 - 26, stating "Polymorphism allows a document type to be explicitly defined as an extension of a pre-existing document type.". An example of using an extended schema is provided at col. 5, line 38 - 67, whereby an <Address> element that has sub-elements for Name, Street, City, and Postal Code is extended to also include (in a new "small document type ContactAddress"; col. 5, lines 58 - 62) a sub-element for Phone Number. See also **204 of Fig. 2**, where this "small document type" is illustrated.

In col. 5, lines 63 - 67, Schwarzhoff states that “A document instance **208** [which uses the extension, and provides a Phone Number in the <billTo> element] of type PurchaseOrder incorporates the new <Address> tag by import statements [see **212, 214**] which reference the schemas ContactAddress.soX **204** [where the extended schema is defined with reference to the original, unextended schema] and CBL.soX **216** respectively.”.

See also col. 6, lines 25 - 30, “When a trading partner receives a document instance [i.e., as input], the <?import ...> statement lists the schemata required to correctly parse it. As such, the recipient [trading partner] should be able to follow the identifiers ... following the import statements to dynamically load the new schemata” (emphasis added).

In Schwarzhoff’s example, an input document instance containing a “PhoneNumber” element can therefore be “correctly parse[d]” using the “new schemata” **204**.

Applicants respectfully submit that these references pertain to using an extended schema for parsing an input document instance (where this parsing might also include *validating*), with no teaching or any suggestion of using a different schema when generating output from the parsed input document. That is, Applicants find no discussion, or suggestion, that can be correlated to their “second syntax level” as recited in Claim 13 (“validating syntax elements of an input ... according to a first syntax level while generating output objects ... according to a second syntax level ...”; Claim 13, lines 3 - 5, emphasis added). Instead,

Schwarzhoff appears to be silent on the generated output, thereby implying that it uses the same extended schema that was used to parse the input document instance. Problems that may result when using this approach have been discussed in Applicants' specification. See, for example, p. 8, lines 13 - 20 and p. 9, line 14 - p. 10, line 5.

In addition, Applicants find no discussion or suggestion in Schwarzhoff that can be correlated to the "suppressing" recited in lines 5 - 7 of Claim 13.

In view of the above, Applicants respectfully submit that a *prima facie* case of obviousness has not been made out as to their independent Claim 13, as the cited text from Schwarzhoff fails to teach or suggest the claim limitations for which it was cited (and such teachings are also not found in Dapp).

Referring next to independent Claim 24, this claim as currently presented recites

- "... the validation [of syntax elements specified in an input document] is performed according to a first syntax level" (Claim 24, lines 5 - 6, emphasis added); and
- "... generating ... output syntax ... [that] will be valid according to a second syntax level ..." (Claim 24, lines 8 - 13, emphasis added).

Claim 24 also specifies a "suppressing" (see Claim 24, line 10).

As discussed above with reference to Claim 13, Schwarzhoff fails to teach these elements of Claim 24 (and such elements are also not taught by Dapp), and Applicants therefore respectfully submit that a *prima facie* case of obviousness has not been made out as to their independent Claim 24.

Independent Claim 26 recites “a first schema” used when validating the input document (Claim 26, lines 4 - 5) and a “second schema for which the output is generated” (Claim 26, line 9), as well as a “suppressing” (Claim 26, line 6). The discussions of Claim 13, above, apply equally to these similar terms of Claim 26, and Applicants therefore respectfully submit that a *prima facie* case of obviousness has not been made out as to their independent Claim 26.

Independent Claim 31 recites “a first syntax level” used when validating the input document (Claim 31, lines 6 - 8) and a “syntax abstraction level” to which the syntax of the generated output conforms (Claim 31, line 11), as well as a “suppressing” (Claim 31, lines 9 - 10). The discussions of Claim 13, above, apply equally to these similar terms of Claim 31, and Applicants therefore respectfully submit that a *prima facie* case of obviousness has not been made out as to their independent Claim 31.

Independent Claim 32 recites “a first syntax level” used when parsing the input document (Claim 32, lines 3 - 4) and a “second syntax level for which the output is generated” (Claim 32, lines 7 - 8), as well as an “omitting” (Claim 32, line 5). The discussions of Claim

13, above, apply equally to these similar terms of Claim 32, and Applicants therefore respectfully submit that a *prima facie* case of obviousness has not been made out as to their independent Claim 32.

Applicants also respectfully submit that the Dapp reference fails to teach, or suggest, the claim limitations for which col. 5, line 19 - col. 6, line 43 of Schwarzhoff was cited in the Office Action. In summary, because neither of the references teaches, or suggests, the above-discussed limitations from Applicants' independent Claims 13, 24, 26, 31, or 32, the requirements for a *prima facie* case of obviousness have not been met. Accordingly, these independent claims are deemed patentable over the references. See *In re Oetiker*, 24 USPQ 2d 1443, 1444 (Fed. Cir. 1992), which stated:

If the examination at the initial stage does not produce a *prima facie* case of unpatentability, then without more the applicant is entitled to grant of the patent.

Dependent Claims 3 - 5, 7 - 9, 11 - 12, 14 - 23, 25, and 27 - 30 are deemed patentable by virtue of the patentability of the independent claims from which they depend.

In view of the above, the Examiner is respectfully requested to withdraw the §103 rejection.

II. Conclusion

Applicants respectfully request reconsideration of the pending rejected claims,

withdrawal of all presently outstanding rejections, and allowance of all remaining claims at an early date.

Respectfully submitted,

/Marcia L. Doubet/

Marcia L. Doubet
Attorney for Applicants
Reg. No. 40,999

Customer Number for Correspondence: 43168

Phone: 407-343-7586

Fax: 407-343-7587